

EXHIBIT R

Keith Flynn

From: Keith Flynn
Sent: Tuesday, May 5, 2015 6:33 PM
To: 'Miglio, Terrence J.'
Subject: RE: Reeser v HFHS

The reason why Hood was not deposed prior to May 5th is because her deposition was unilaterally cancelled by Defendant. The stipulation that Defendant entered into was to resolve Plaintiff's Motion to Compel. It's unfortunate that you waited until now to seek an adjournment. But given how far along we are in the process, the client has not agreed to the requested extension.

- Keith

From: Miglio, Terrence J. [mailto:tjmiglio@varnumlaw.com]
Sent: Monday, May 4, 2015 11:43 AM
To: Keith Flynn
Subject: Reeser v HFHS

Defendant will be filing a Motion for Summary Judgment in this case. Presumably you will not concur in the Motion. The deadline for filing the Motion is May 11th. Because we have agreed to allow you to take Jill Hood's deposition tomorrow, her deposition transcript will not be available in enough time to use it in the Motion. Moreover, I will be out of the country from May 9th until May 14th. Judge Steeh's staff has said that we can move the dispositive motion cutoff date by a stipulated order. Will you agree to move the dispositive motion cutoff dated 10 days until may 21st? Please advise.

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